

**BURSOR & FISHER, P.A.**

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*Counsel for Plaintiff*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

LARAINÉ WOOD, individually and on behalf  
of all other similarly situated,

Plaintiff,

v.

FARMERS INSURANCE EXCHANGE,  
TRUCK INSURANCE EXCHANGE, FIRE  
INSURANCE EXCHANGE, MID-CENTURY  
INSURANCE COMPANY, and FARMERS  
NEW WORLD LIFE INSURANCE  
COMPANY,

Defendants.

Case No. 2:22-cv-06103-SVW-MRW

**PLAINTIFF'S RESPONSE TO ORDER  
TO SHOW CAUSE**

1 Plaintiff Laraine Wood ("Plaintiff"), through undersigned counsel, hereby responds to the  
2 Court's October 13, 2022, Order to Show Cause ("Order"). ECF No. 13. The Order requested  
3 Plaintiff to show cause why this case should not be dismissed for lack of prosecution.

4 On August 26, 2022, Plaintiff filed her class action complaint ("Complaint") against  
5 Farmers Group, Inc. ("Farmers"), for violations of the Telephone Consumer Protection Act  
6 ("TCPA"). On September 1, 2022, Plaintiff filed Proof of Service of her Complaint with the Court.  
7 ECF No. 10. Farmers was directed to file its response to Plaintiff's Complaint by September 21,  
8 2022. *Id.* On September 21, 2022, Farmers filed a stipulation extending its deadline to respond to  
9 Plaintiff's complaint until October 12, 2022. During that time, Counsel for Plaintiff and Farmers  
10 have been in constant communication discussing Plaintiff's claims. Counsel for Farmers notified  
11 Plaintiff that during its investigation of her claims, that Plaintiff had sued the wrong party. Farmers  
12 and Plaintiff engaged in informal discovery to support their findings.

13 Based on this information, Plaintiff informed Farmers of her intent to file an amended  
14 complaint to cure these purported deficiencies, and Defendant provided Plaintiff with consent to do  
15 the same pursuant to Fed. R. Civ. P. 15(a)(2). On October 18, 2022, Plaintiff filed her amended  
16 complaint, naming Farmers Insurance Exchange, Truck Insurance Exchange, Fire Insurance  
17 Exchange, Mid-Century Insurance Company, and Farmers New World Life Insurance Company  
18 (collectively, "Defendants") as the proper parties in this action. ECF No. 14. At no point in time  
19 has Plaintiff abandoned her claims. She has continued her investigation and intends on vigorously  
20 prosecuting her claims, on behalf of herself as well as the putative class.  
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24 Dated: October 20, 2022

Respectfully submitted,

27 By: /s/ Yeremey Krivoshey  
Yeremey O. Krivoshey  
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